

DENNIS C. BROWN
ATTORNEY AT LAW
8124 COOKE COURT, SUITE 201
MANASSAS, VIRGINIA 20109-7406

PHONE 703/365-9436
D.C.BROWN@ATT.NET

FAX 703/365-9456
NOT ADMITTED IN VIRGINIA

May 8, 2006

Universal Service Administrative Company
2000 L Street, N.W.
Suite 200
Washington, D.C. 20036

Re: Demand for Refund
Waterway Communications System, LLC
Filer ID # 808786
Mobex Network Services, LLC
Filer ID # 822896

Dear Sir or Madam:

I represent the radio system interests of Waterway Communications System, LLC (Watercom); Mobex Network Services, LLC (Mobex); and Maritime Communications/Land Mobile, LLC (MC/LM) before the Federal Communications Commission. On behalf of Watercom, Mobex and MC/LM, I hereby demand a refund of unauthorized charges made by and paid to Universal Service Company (USAC) in the amount of \$1,301,230.00.

In its letter to USAC dated March 20, 2001, Watercom informed USAC that it had been acquired by Mobex Communications, Inc. The Watercom radio system assets were assigned to Mobex and were operated by Mobex until 2006 when all Mobex assets were acquired by MC/LM. Watercom, Mobex, and MC/LM's radio communications service has, at all times, been limited to the provision of Maritime Radio Services under Federal Communications Commission authorizations for Automated Maritime Telecommunications Systems. Because the only service that they provided was Maritime Radio Service, neither Watercom nor Mobex has ever been liable for contribution to the Universal Service Fund. I shall explain why USAC should not have billed for Universal Service fund contributions and why a refund is due.

At paragraph 786 of its Report and Order in CC Docket No. 96-45, 12 FCC Rcd 8776 (1997), the Commission determined not to impose Universal Service Fund contribution obligations on certain providers of telecommunications service. The Commission stated that it "agree[d] with the Joint Board's recommendation that any entity that provides interstate telecommunications to users other than significantly restricted classes for a fee should

contribute to the support mechanisms," 12 FCC Rcd at 9178. At footnote 2013 on page 9178, the Commission referred to its determination of those entities which provide service to significantly restricted classes of users.

At footnote 2013, the Commission referred to its Second Report and Order in Implementation of Sections 3(n) and 332 of the Communications Act, 9 FCC Rcd 1411, 1439 (1994) (the CMRS 2d R&O). At paragraph 67 of the CMRS 2d R&O, the Commission explained that in applying the statutory language, it looked to several relevant factors, such as the type, nature and scope of users for whom a service is intended. The Commission explained specifically that

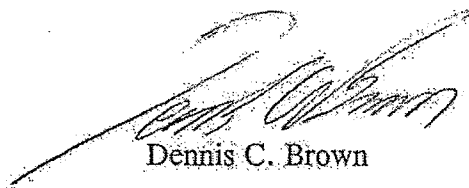
in the case of existing eligibility classifications under our Rules, service is not "effectively available to a substantial portion of the public" if it is provided exclusively for internal use or is offered only to a significantly restricted class of eligible users, as in the following services: (1) Public Safety Radio Services; (2) Special Emergency Radio Service; (3) Industrial Radio Services (except for Section 90.75, Business Radio Service); (4) Land Transportation Radio Services; (5) Radiolocation Services; (6) Maritime Service Stations; and (7) Aviation Service Stations.

id. Omitted footnotes after each Radio Service refer to specific Rule Sections. The footnote for Maritime Service Stations referred to 47 C.F.R. §80.15, which includes all Maritime Service Stations, including Public Coast stations of which Automated Maritime Telecommunication System stations are a species. Accordingly, it is clear that the Commission has excluded providers of the services of Maritime Service Stations from any requirement to contribute to the Universal Service Fund.

I have prepared and enclosed herewith a summary spreadsheet of the USAC's improper charges to Watercom and to Mobex together with copies of USAC's statements and the records of payment by Watercom and by Mobex. Here is a brief explanation of the spreadsheet columns. For each USAC invoice number, the upper row represents USAC's charges and the lower row reflects the payments made to USAC. The Company Name column indicates the company which USAC billed and the company which made each payment. The Statement column provides the amount billed. The USAC Date column indicates the date on which USAC received payment. The Payment by EFT column includes payments made by electronic funds transfer, while the Payment by Check column includes payments made by check. The total paid for each year, 2001-2004, is shown, as well as the Grand Total.

For all the foregoing reasons, Watercom and Mobex demand refund of the unauthorized charges in the amount of \$1,301,230.00. Because the assets formerly held by Watercom and by Mobex are now held by MC/LM and, pursuant to the asset purchase agreement between Mobex and MC/LM, MC/LM is entitled to receive all refunds to which Mobex has a right, Watercom and Mobex request that the refund payment be made to MC/LM.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Dennis C. Brown", is written over the typed name.

Dennis C. Brown



John G. Smith
Vice President - General Manager
(812) 288-0454 FAX: (812) 288-0574
E-Mail: jsmith@watercom.com

Waterway Communications System LLC
453 E. Park Place • Jeffersonville, IN 47130
(800) 752-3000

March 20, 2001

Form 499 Data Collection Agent
Attention: Lori Terraciano
80 South Jefferson Road
Whippany, NJ 07981

Dear Ms. Terraciano:

This is to inform you that on September 6, 2000, Waterway Communications System LLC was sold by American Commercial Lines, Jeffersonville, Indiana, and purchased by Mobex Communications, Inc. The CEO and President of Mobex Communications is John Reardon, and his mailing address is: 1150 18th Street N.W., Suite 250, Washington, D.C. 20036.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "John G. Smith", is written over a horizontal line.

John G. Smith
Vice President - General Manager

JGS:js



Jeffrey A. Mitchell
Associate General Counsel

Office of General Counsel

BY ELECTRONIC AND CERTIFIED MAIL

June 30, 2006

Dennis C. Brown, Esq.
8124 Cooke Court, Suite 201
Manassas, VA 20109

Re: Demand for Refund
Waterway Communications System, LLC (Filer ID: 808786)
Mobex Network Services, LLC (Filer ID: 822896)

Dear Mr. Brown:

I am responding to your letter of May 8, 2006, on behalf of Waterway Communications System, LLC (Watercom) and Mobex Network Services, LLC (Mobex) demanding the refund of contributions to the federal Universal Service Fund (USF) made by Watercom and Mobex's during the years 2001 through 2004. Your letter indicated Watercom and Mobex at all relevant times have been exclusively providers of "Maritime Radio Services." You further stated your belief that "the [Federal Communications] Commission [(FCC or Commission)] has excluded providers of the services of Maritime Service Stations from any requirement to contribute to the [USF]."

In order to adequately respond to your claim that Watercom and Mobex were and are exempt from the USF contribution obligation, we will need you to provide further information regarding revenue associated with the services provided by Watercom and Mobex during the years 2000 through 2004 (the "Services"). Accordingly, at your earliest convenience, please respond to the following questions which are based on revenue information previously reported to USAC and certified by officers of Watercom and Mobex:¹

- Please provide a reasonably detailed description of the Services.
- Between 2001 and 2004, Watercom and Mobex reported approximately [REDACTED] of their revenues on FCC Form 499-A Line 413, "Operator Assistance" and Line

¹ See 47 C.F.R. § 54.711(a) ("An executive officer of the contributor must certify to the truth and accuracy of historical data included in the Telecommunications Reporting Worksheet [(FCC Form 499-A)] [USAC] may verify any information contained in the Telecommunications Reporting Worksheet. Contributors shall maintain records and documentation to justify information reported in the Telecommunications Reporting Worksheet . . . for three years and shall provide such records and documentation to [USAC] upon request.")

414, "Ordinary Long Distance." Please explain whether revenues reported on these lines are associated with traffic that originated from, traversed, or was terminated to the Public Switched Telephone Network (PSTN).

- With respect to customers associated with revenues reported in Lines 413 and 414, please provide a customer list, explain the billing process, and provide examples of the invoices used to bill such customers.²
- Between 2001 and 2004, Watercom and Mobex reported approximately [REDACTED] on FCC Form 499-A Line 403 which includes "Surcharges or other amounts on bills identified as recovering State or Federal universal service contributions."
- Please provide a detailed explanation regarding the nature of revenue amounts reported by Watercom and Mobex on Line 403.
 - Why did Mobex report [REDACTED] in Line 403 on the 2005 FCC Form 499-A?
 - In the event Watercom/Mobex received a refund of USF contributions, please address whether Watercom/Mobex would attempt to refund any amounts that may have been collected from end-user customers for the express purpose of recovering USF contributions.
- Watercom and Mobex reported revenue as [REDACTED] interstate revenue on the 2001 through 2004 and 2006 Form 499-A filings. Why for the 2005 FCC Form 499-A did Mobex [REDACTED]?
- MOBEX Communications, Inc. is the holding company for six companies with active Form 499 Filer Identification Numbers (Filer IDs) that have not filed Form 499s since 2003.³ Please explain.

² USAC is obligated by law to maintain the confidentiality of any information you provide. See 47 C.F.R. § 54.711(b) ("[USAC] shall keep confidential all data obtained from contributors, shall not use such data except for purposes of administering the universal service support programs, and shall not disclose such data in company-specific form unless directed to do so by the Commission.").

³ MOBEX Midwest, Inc. (Filer ID 811331); MOBEX Texas, Inc. (Filer ID 811696); MOBEX South Carolina, Inc. (Filer ID 811698); MOBEX North Carolina, Inc. (Filer ID 811699); MOBEX Idaho, Inc. (Filer ID 811700); MOBEX Holding, Inc. (Filer ID 820900).

Dennis C. Brown, Esq.
Watercom & Mobex
June 30, 2006
Page 3

We look forward to your timely responses. Please do not hesitate to call if you have questions. Thank you.

Sincerely,

/s/

Jeffrey Mitchell
Associate General Counsel

cc John Reardon, President, Maritime Communications/Land Mobile, LLC (via electronic mail)



Maritime Communications/Land Mobile, LLC

August 14, 2006

Jeffrey A. Mitchell
Associate General Counsel
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, DC 20036

Re: Letter of June 30, 2006

Dear Jeff,

Thanks for your letter of June 30th. Over the past weeks, I have worked with our personnel in our network operations center to gather information to respond to your request; I hope this response is helpful.

While I note from the outset that, as you informed us, filers need only retain records for the past three years, your request covers the past six years. Therefore, it's hopefully understandable that some of the data may be incomplete or offsite in storage from the years 2000 through 2003.

Regardless of how much was billed and paid to USF by Watercom and its parent, Mobex Communications, the fact remains that *these amounts were paid to USF* and should not have been. Thus, we believe that our central premise renders irrelevant much of the data which USF requested: operators of Automated Maritime Telecommunications Systems are specifically authorized under 47 C.F.R. Part 80 as providers of Maritime radio service. As Maritime licensees, they are exempt from USF contribution requirements.

However, in the spirit of cooperation and providing as much information as we can for you, we have prepared the following responses. To assist you, the responses below are organized in the same sequence as the questions posed in your letter.

Item One. Description of Services.

Watercom provides Maritime Communications Services to the towboat and barge industry. Based out of Jeffersonville, Indiana, and situated along the Ohio River, Watercom's network operations center is the hub of the over 4,000 mile long Watercom Maritime Communications system.

Watercom provides ship to shore and shore to ship communications including data, fax, and interconnected calling. Operators of vessels have a pilot's cabin atop which is normally mounted an antenna to receive and send signals.

218 North Lee Street Suite 318 Alexandria, Virginia 22314 703.778.6555 office 703.548.4399 fax www.mclmllc.com

Within the pilot-house is the Watercom receiver and transmitter. This equipment typically resides in the electronics room of the vessel, and is vibration resistant. For the user, the experience is like a normal telephone or fax machine: they see a desktop-type phone with a dial pad and an adjacent fax machine.

When calls are made to or from the vessel, the call goes out to the nearest Watercom site location along the Ohio and Mississippi River System. That call then is routed through the PSTN to its final destination. If the vessel operator needs assistance, he contacts Watercom operator assistance in Jeffersonville at the NOC.

To send a fax, the operator simply dials the number and sends, like a regular office environment fax. This type of automated maritime connectivity allows vessels to keep moving on the river. They can fax ahead to the next port of call to order supplies, repairs or personnel changes. The crew can phone loved ones at home. The captain can report on his location. The Watercom system was designed specifically for use above maritime vessels and provides user-friendly capabilities which pocket cellular phones cannot.

In the event of emergency, the Watercom system allows communication to shore-based authorities. Working on the water is very hazardous, and this is an excellent tool where cellular phones do not always work.

Mobex Communications purchased Watercom in September 2000. Mobex also acquired Regionet, a company with limited operations using Automated Maritime Telecommunications System Licenses on the East Coast and West Coast. Regionet offered similar services, i.e. voice, fax and two way communications, but had only a few dozen customers and little revenue. The previous owners were not terribly successful in selling service to anyone, Jeff. Nonetheless, this minimal Regionet service revenue was included in the USF filings and remains part of the Maritime Services under which Mobex operated its Automated Maritime Telecommunications Services.

As part of the FCC's requirements for Part 80 AMTS licenses like this, a system must be capable of being interconnected to the PSTN in order to fulfill the automated portion of the FCC's rules for AMTS. Mobex has performed that, even where customers no longer demanded interconnection, the capability exists within every system.

In sum, the service and revenue are Maritime-centric. Attached is a document which further details how calls were made on the Watercom system, and includes diagrams of the calling process.

Item Two: Line 413 Operator Assistance and Line 414 Long Distance.

The FCC's rules state that AMTS licenses must provide the capability of interconnection to maritime users. Watercom did just that in the period 2000-2004, when these rules existed. Revenues which were reported on Lines 413 and Line 414 were derived from the provision of Maritime radio communications service. We terminated calls to our

mobile subscribers which originated on the Public Switched Telephone Network. The PSTN terminated calls which were originated by our mobile subscribers. Calls from one of our subscribers' mobiles to another of our subscribers' mobiles transited the PSTN.

You asked for a customer list, attached is a customer list from 2002. You will see that for the period in question, i.e. 2000-2004, Watercom serviced about 90% of the towboat and barge industry on the Mississippi River, its tributaries (like the Ohio and Illinois) and along the Gulf of Mexico shoreline. Petrochemicals, grain, bauxite, coal, gravel, sand and other basic commodities are moved over this inland waterway system, from Pittsburgh and Minneapolis in the North down through St. Louis to New Orleans in the South, and along the Gulf of Mexico coastline from the Florida panhandle to the Brownsville border of Texas. Watercom allows vessels to move throughout this vast area and communicate with the shore and with each other.

The billing process was based on a mixture of flat rate pricing for airtime in the case of [REDACTED] the largest user, and airtime billing for others, like [REDACTED]. USF and other taxes would be added to the invoices and clearly labeled as such. Attached is a sample invoice. Please keep customer information confidential, as you indicated you would in your letter. Our customers appreciate having their cost and service level records kept confidential from their competitors in the towboat and barge industry.

Item Three

You requested information on Form 403 responses, including the nature of revenue amounts. You also wondered why Mobex charged [REDACTED] in 2005 for USF. That is because mobile satellite companies took the majority of the Watercom business in the years 2004 and early 2005. Mobex pulled down most of its interconnection POTS lines and restricted services to cut costs. Mobex billed customers a flat rate, and [REDACTED] USF. Instead, Mobex realized that its revenue was *de minimus* under any USF standards and that customers [REDACTED] interconnected. This view has been justified by the resultant refund of monies which Mobex paid into USF in 2005, despite not collecting from the end user for those taxes. Again, Mobex now recognizes that it should never have needed to pay USF fees, or charge customers, because those fees were not due and payable by Part 80 licensees like Mobex.

You also ask whether Mobex would contact customers and inform them of the refund so they may collect their pro rated share. It is my understanding from discussing this with Dave Predmore, Mobex's current chief officer, that Mobex would indeed contact customers and invite them to submit a refund request. Mobex would ask them to submit invoices from the relevant period of time in which they are requesting a refund. This is mainly due to the fact that not all records have been retained by Mobex for the billing periods of 2000-2002. Again, USAC rules seem to support the fact that operators do not need to keep records indefinitely. Nonetheless, we know who the customers were and would contact them. Mobex and MCLM would be pleased to provide upon request a copy to USAC of each letter sent and any responses received, as well as refunds paid.

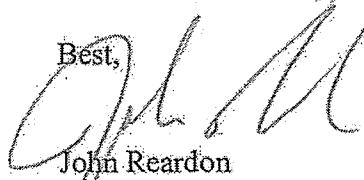
Item Four

Mobex Communications sold the assets of those six entities in November 2001 to CTA, LLC, an unrelated third party based out of Ft. Wayne, Indiana. Those six Mobex legal entities have been dissolved, with the exception of Mobex South Carolina, which is itself an empty shell corporation with no assets. Mobex will take any proper action to inform USAC officially so that these entities are removed from its database.

* * * *

Jeff, I hope this information is helpful. If you have additional questions, I suggest we follow up with a meeting to go over any other items of inquiry you may have. If so, please let me know if you are available for lunch sometime, I am based in Alexandria and could meet you near your offices.

Best,



John Reardon
President
MCLM, LLC

Cc: Dennis C. Brown, Esq.



Universal Service Administrative Company

**Form 499 CONSOLIDATED FILING
CERTIFICATION STATEMENT**


PLEASE NOTE THAT CONSOLIDATED FILING STATUS IS ENCOURAGED TO BEGIN WITH A MAY 1 FORM 499-Q FILING SO THAT ALL REVENUE WORKSHEETS FILED FOR A PARTICULAR CALENDAR YEAR ARE REPORTED AT THE SAME "LEVEL."

Consolidated filing of the FCC Form 499 will be permitted only if the filing entity certifies that all of the following conditions are met:

1. A single entity oversees the management of affiliated systems;
2. A single entity sends bills to customers and these bills identify a single entity (or trade name) as the service provider, rather than identifying the individual legal entities;
3. All revenues are posted to a single general ledger;
4. To the extent that separate revenue and expense accounts exist, they are derived from one consolidated set of books and the consolidated filing must cover all revenues contained in the consolidated books;
5. Customers have a single point of contact;
6. The consolidated filer acknowledges that process served on the consolidated filer would represent process served on any or all of the affiliated legal entities;
7. The consolidated filer agrees to document and resolve all slamming complaints that might be served on either the filing entity or any of the affiliated legal entities;
8. The consolidated filer obtains a separate FCC Registration Number (FRN) from those assigned to its affiliated legal entities;
9. The consolidated filer acknowledges that its obligations with regard to universal service, Telecommunications Relay Services, Local Number Portability, the North American Numbering Plan, and regulatory fees will be based on the data provided in consolidated Worksheet filings, that it bears the responsibility to satisfy those obligations; and entities covered by the filing are jointly and severally liable for such obligations; and
10. The consolidated filer acknowledges that it: (A) was not insolvent on the date it undertook to make payments on a consolidated basis or on the date of actual payments to universal service, Telecommunications Relay Services, Local Number Portability, the North American Numbering Plan, and regulatory fees, and did not become insolvent as a result of such undertaking or payments; (B) was not left with unreasonably small capital as a result of such undertaking or payments; and (C) was not left unable to pay debts as they matured as a result of such undertaking or payments.

I certify that I am an officer of the consolidated reporting entity named below, that I have examined the May 1st FCC Form 499-Q and its instructions, that we meet all of the above ten conditions, and that to the best of my knowledge, information and belief, we qualify to file 2002 revenue on a consolidated basis. A list of the legal names of all entities covered by this consolidated filing (for wireless carriers, a list of all radio licenses (call signs) is included) is found on page 2 of this "Form 499 Consolidated Filing Certification Statement."

Consolidated Filer Name: Mobex Network Services, LLC FRN# 0000-1581-52

Officer's Signature: 

Printed Name of Officer: Brian Howell, CFO Brian Howell

Date: 7-25-03

Page 1 of 2



Universal Service Administrative Company

**Form 499 CONSOLIDATED FILING
CERTIFICATION STATEMENT**

Consolidated Filer Name: Mobex Network Services,LLC____ FRN# 0000-1581-52

The following is a list of the Filer 499 IDs and legal names of all legal entites that are covered by this consolidated filer and FRN# (please copy page and attach if needed):

Filer 499 ID:	Legal Name of Carrier:	Licenses (Call Signs) if applicable
8 _ _ _ _ _		
819032	Regionet Wireless Operations, LLC	
808786	Waterway Communications System, LLC	



MOBile EXcellence

453 East Park Place
Jeffersonville, Indiana 47130

July 24, 2003

National Exchange Carrier Association
Attn: Fabio Nieto
80 South Jefferson Rd
Whippany, NJ 07981

Mr Nieto,

I am writing you on the matter of my Consolidated Filing Certification Statement that I have enclosed. Mobex Network Services, LLC, 499 ID 822896 should be the surviving entity after consolidating Waterway Communications Systems LLC, 499 ID 808786 and Regionet Wireless Operations, LLC, 499 ID 819032. The 2003 499 A filed by Mobex Network Services, LLC in March of 2003 is the combined revenues of the three entities mentioned above. Once the consolidation is complete the revenue filing would stay the same. Please process the consolidation certificate as soon as possible, as I am having some difficulty with the monthly USAC invoices, and the annual Interstate Telecommunications Relay Service Fund invoices. If there are any problems with my requests, please contact me at (812) 288-0267 to discuss this matter further.

Regards

Ron Summers

A handwritten signature in cursive script that reads "Ron Summers".

Accounting Manager
MOBEX Communications, Inc.

ENCL

453 E Park Place • Jeffersonville, IN 47130
(812) 288-0267 • Fax (812) 288-0282



ALTERNATIVE BILLING ARRANGEMENTS FORM

Line 208 of Form 499-A asks for one billing address and contact person to be used by all four administrators. If your company requires invoices to be sent to different contacts/addresses for the four funds, please use this form. Universal Service Fund invoices will be mailed to the address input on Line 208 of the 499-A itself.

Filer 499 ID: 822896

Legal Name of Carrier: Mobex Network Services, LLC- CONSOLIDATED

TRS- Telecommunications Relay Services Fund Billing Address

Billing Contact First Name: Sharon Last Name: Watkins

Billing Contact Telephone: 812 288-0570 Extension:

Billing Contact Fax Number: 812 288-1690 Billing Contact E-Mail: sharon.watkins@mobex.com

Billing Contact Address: 453 E Park Place

City: Jeffersonville State: IN Zip Code: 47130

NANP- North American Numbering Plan Fund

Billing Contact First Name: Same Last Name:

Billing Contact Telephone: Extension:

Billing Contact Fax Number: Billing Contact E-Mail:

Billing Contact Address: Same

City: State: Zip Code:

LNP- Local Number Portability Fund

Billing Contact First Name: Same Last Name:

Billing Contact Telephone: Extension:

Billing Contact Fax Number: Billing Contact E-Mail:

Billing Contact Address: Same

City: State: Zip Code:



ALTERNATIVE BILLING ARRANGEMENTS FORM

Line 208 of Form 499-A asks for one billing address and contact person to be used by all four administrators. If your company requires invoices to be sent to different contacts/addresses for the four funds, please use this form. Universal Service Fund invoices will be mailed to the address input on Line 208 of the 499-A itself.

Filer 499 ID: 822896

Legal Name of Carrier: Mobex Network Services, LLC- CONSOLIDATED

TRS- Telecommunications Relay Services Fund Billing Address

Billing Contact First Name: Sharon Last Name: Watkins

Billing Contact Telephone: 812 280-8609 Extension:

Billing Contact Fax Number: 812 280-8445 Billing Contact E-Mail: sharon.watkins@mobex.com

Billing Contact Address: 6200 Hwy 62 E Bldg 2501 Ste 875

City: Jeffersonville State: IN Zip Code: 47130

NANP- North American Numbering Plan Fund

Billing Contact First Name: Same Last Name:

Billing Contact Telephone: Extension:

Billing Contact Fax Number: Billing Contact E-Mail:

Billing Contact Address: Same

City: State: Zip Code:

LNP- Local Number Portability Fund

Billing Contact First Name: Same Last Name:

Billing Contact Telephone: Extension:

Billing Contact Fax Number: Billing Contact E-Mail:

Billing Contact Address: Same

City: State: Zip Code:

November 29, 2007

499 Data Collection Agent
C/o USAC 2000 L Street, N.W.
Suite 200
Washington, DC 20036
Attn: Fred Theobald

Dear Mr. Theobald:

The purpose of this letter is to provide an update to you on the status of Mobex Network Services, LLC ("Mobex" or "Company").

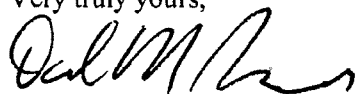
In May 2005, Mobex signed an asset sale agreement with Maritime Communications/Land Mobile, LLC. A significant portion of the purchase price was advanced to fund MNS' operations through the closing, thereby protecting its main asset, FCC licenses, by keeping them constructed and operating. The management team successfully closed this sale on December 30, 2005. The proceeds of the sale have gone to paying off substantial debt due to existing, mostly secured, creditors of Mobex Network Services, LLC.

The balance of proceeds is held in escrow with a law firm in order to satisfy state tax obligations and other contingent liabilities, including an IRS audit. There have been no other material assets in Mobex since completing the sale and payoff of the debt and Mobex has not conducted any business since that time. Mobex was certainly De Minimus throughout the 2007 year.

We expect to wrap up the remaining state tax matter and dissolve Mobex this calendar year or early 2008.

In the meantime, please feel free to contact me at (202) 288-9656 or by e-mail at predmores@att.net

Very truly yours,



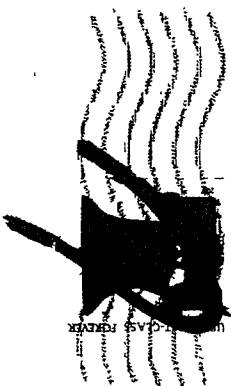
David Predmore
Acting President

MOBEX
Communications, Inc.

MOBILE EXcellence

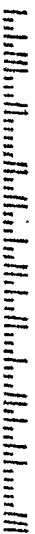
453 EAST PARK PLACE
JEFFERSONVILLE, IN 47130

NO VA 220
29 NOV 2007 PM 5 L



499 Data Collection Agent
ATTN: FRED THEOBALD
C/O USAC
2000 L STREET, N.W.
Suite 200
WASHINGTON, DC 20036

2003644307





MOBile EXcellence

453 East Park Place
Jeffersonville, Indiana 47130

March 20, 2002

Ms. Lori Terraciano
Form 499 Data Collection Agent
Universal Service Administration Co.
80 South Jefferson Road
Whippany, NJ 07981

Re: 499-A 2001 Reporting Worksheets for Mobex

Dear Ms. Terraciano:

Please find enclosed the completed Telecommunications Worksheets (FCC Form 499-A) for the following Mobex Communications, Inc., business units:

Regionet Wireless Operations, Inc. and Waterway Communications System LLC – Please note that in August, 2001, the assets of Regionet and WATERCOM were incorporated into Mobex Network Services LLC. Our next filing of form 499-A in April, 2003, will reflect this name change.

Mobex Holdings, Inc.

Mobex Texas, Inc.

Mobex Midwest, Inc.

Mobex Idaho, Inc.

Mobex South Carolina, Inc.

Mobex North Carolina, Inc.

Mobex Atlantic, Inc. – This corporation (815256) was dissolved July 31, 2001. (See enclosed Certificate of Dissolution from the Commonwealth of Virginia.)

Sincerely

A handwritten signature in black ink, appearing to read "John G. Smith", is written over a horizontal line.

John G. Smith
Vice President – Chief Operating Officer

JGS:js
Enclosures

CERTIFIED MAIL